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16 **UNITED STATES DISTRICT COURT**  
17 **CENTRAL DISTRICT OF CALIFORNIA**

18 U.S. EQUAL EMPLOYMENT  
19 OPPORTUNITY COMMISSION,

20 Plaintiff,

21 vs.

22 MEATHEAD MOVERS, INC., and  
23 DOES 1-10, inclusive,

24 Defendants.  
25  
26  
27  
28

Case No.: 2:23-cv-08177-DSF-AGR<sub>x</sub>

**DISCOVERY MATTER**

**PLAINTIFF EEOC'S NOTICE OF  
MOTION FOR PROTECTIVE  
ORDER FOR DEPOSITION OF  
INVESTIGATOR UNDER LR 37-2**

Hearing: April 8, 2025, 10:00 a.m.

Judge: Hon. Alicia G. Rosenberg

Discovery Cut-Off: 12/2/2025

Pre-Trial Conference: 7/20/2026

Trial Date: 8/18/2026

1 **TO THE COURT, DEFENDANT, AND ALL ATTORNEYS OF RECORD:**

2 **PLEASE TAKE NOTICE** that on Tuesday, **April 8, 2025 at 10:00 a.m.**,  
3 or as soon thereafter as this matter may be heard, in the above captioned Court,  
4 located at 255 E. Temple St., Los Angeles, CA, 90012, Courtroom 550, 5th Floor,  
5 before the Honorable Alicia G. Rosenberg, Magistrate District Judge, Plaintiff  
6 United States Equal Employment Opportunity Commission (“Plaintiff”) will and  
7 hereby does move for a Protective Order barring Defendant Meathead Movers, Inc.  
8 (“Defendant”) from taking the deposition of EEOC Investigator Benjamin  
9 Lidholm.

10 This Motion is made pursuant to Federal Rules of Civil Procedure  
11 26(b)(2)(C)(i)-(iii) and 26(c)(1) and Local Rule 37. This Motion is based on this  
12 Notice of Motion, the concurrently-filed Joint Stipulation, the accompanying  
13 Declaration and supporting exhibits, the proposed order, the pleadings and papers  
14 on file in this action, and on other matters presented to the Court at the hearing or  
15 in supplemental memorandum.

16 This motion is made following the conferences of counsel pursuant to Local  
17 Rule 37-1, which took place in-person on February 14, 2025. The Parties were  
18 unable to resolve this matter informally. As such, the EEOC respectfully moves for  
19 a Protective Order barring Defendant from taking the deposition of Investigator  
20 Lidholm.

21  
22 Respectfully submitted,  
23 Dated: March 13, 2025 U.S. EQUAL EMPLOYMENT  
24 OPPORTUNITY COMMISSION

25  
26 By: /s/ Andrea E. Ringer  
27 Andrea Ringer  
28 Attorney for EEOC